

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PROSHARES TRUST
SECURITIES LITIGATION

X
: **Civil No. 1:09-cv-06935-JGK**
:
:X **NOTICE OF MOTION**

COUNSEL:

PLEASE TAKE NOTICE that, upon the annexed Declaration of Victor E. Stewart, and the accompanying Memorandum of Law, dated August 26, 2011, Plaintiffs, by their attorneys Lovell Stewart Halebian Jacobson LLP and Zamansky & Associates, will move this Court, before the Honorable John G. Koeltl, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be set by the Court, pursuant to Fed. R. Civ. P. 15, for an order granting Plaintiffs leave to amend their Complaint, and granting Plaintiffs such other and further relief as this Court deems just and proper.

Dated: New York, New York
August 26, 2011

Respectfully submitted,

**LOVELL STEWART HALEBIAN JACOBSON
LLP**

By: /s/ Victor E. Stewart
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